

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION
DOCKET NO. E-100, SUB 169

In the Matter of:)	
Request for Declaratory Judgment that)	
Modifications Adding Gas-Fired)	NCSEA’S PETITION TO
Generation to Coal Units Require a)	INTERVENE
Certificate of Public Convenience and)	
Necessity)	

NCSEA’S PETITION TO INTERVENE

Pursuant to North Carolina Utilities Commission (“Commission”) Rules R1-5, R1-7, and R1-19, the North Carolina Sustainable Energy Association (“NCSEA”) hereby petitions to intervene in the above-referenced docket. In support of this petition, NCSEA states as follows:

1. NCSEA is a non-profit corporation formed under the laws of North Carolina, with individual, business, and government members located across the State. NCSEA’s mission is to promote a sustainable future through the use of renewable energy and energy efficiency programs. NCSEA seeks to achieve its objectives by advocating for public policies that encourage the responsible technological and market development of renewable energy and energy efficiency, including all aspects of demand side management, a smart grid, energy storage, and vehicle electrification.
2. Many of NCSEA’s members are customers of Duke Energy Carolinas, LLC (“DEC”) and use electric power supplied by DEC in their homes and businesses. Some of these members are potential owners and operators of small distributed generation systems that are interconnected with the DEC system. These NCSEA members often file applications for certificates of public convenience and necessity (“CPCN”) for their solar facilities.

3. The Request for Declaratory Judgment filed by NC WARN, Center for Biological Diversity, and Appalachian Voices raises issues of great importance to NCSEA members related to circumstances in which new CPCNs are required. NCSEA has participated in and offered comments or testimony in dozens of dockets, including integrated resource plan dockets, rate case dockets, and avoided cost dockets, which all speak to the generation mix in North Carolina, including regulatory requirements to bring online new or modified generation assets. NCSEA's participation in this docket will bring critical insight, knowledge, and understanding to the proceeding.

4. NCSEA's address is 4800 Six Forks Rd, Suite 300, Raleigh, NC 27609. All correspondence related to this proceeding should be addressed to:

Peter H. Ledford
General Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

Benjamin Smith
Regulatory Counsel for NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 111
Ben@energync.org

5. Pursuant to Commission Rule R1-39, NCSEA agrees to electronic service of all pleadings and other filings in this matter.

WHEREFORE, for the reasons set forth above, NCSEA prays that it be allowed to intervene in this matter.

Respectfully submitted,



Peter H. Ledford
N.C. State Bar No. 42999
General Counsel
NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org

VERIFICATION

Peter H. Ledford, first being duly sworn, deposes and says that he is the attorney for NCSEA; that he has read the foregoing Petition to Intervene and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of NCSEA.

This the 21st day of October, 2020.



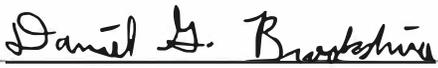
Peter H. Ledford

NORTH CAROLINA
WAKE COUNTY

Sworn to and subscribed before me,

this the 21st day of October, 2020.

[AFFIX SEAL OF NOTARY]



Notary Public

**Daniel G Brookshire, Notary Public
Orange County, North Carolina
My Commission Expires 7/2/2022**



Printed Name of Notary Public
My Commission Expires: 7-2-2022

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 21st day of October, 2020.



Peter H. Ledford
N.C. State Bar No. 42999
General Counsel
NCSEA
4800 Six Forks Road
Suite 300
Raleigh, NC 27609
(919) 832-7601 Ext. 107
peter@energync.org